

Privacy Policy

Flybe is committed to respecting your privacy and we know that it is important for you to understand how we will use your personal information. Please read this privacy policy carefully and if you have any queries, please contact us using the details set out in section 3 below.

KEY SUMMARY

We are Flybe Limited (having company number 12875147) of 4 Cork Street, 1st Floor, London, United Kingdom, W1S 3LB “**we**” or “**us**”.

We collect, process and store your personal information:

- if you visit our website or use an app provided by us;
- if you submit your personal information to us via our website or an app provided by us;
- if you book a flight or purchase a service offered by us through a third party;
- in connection with a flight or service you have purchased from or through us; or
- if you call, email or write to us;
- if you enter a competition or provide feedback;
- if you subscribe to any of our publications;
- if you contact us or submit information to us via social media platforms; or
- if your personal information was transferred to us following the insolvency of the 'old' Flybe Limited (company number 02769768). If this is relevant to you, we will send you an email communication making it clear that we are now a data controller for your personal data as a result of the transfer of assets .

Some of the flights and services that we offer are provided by third parties and, if you purchase those flights or services, that third party will process personal information about you.

We share your personal information with third party service providers and other airline operators (in the circumstances described below) that act on our behalf to provide flights and/or services to us. Examples are companies that provide ground handling services at airports, IT services companies that manage reservations and boarding on our behalf and payment processing organisations.

This Privacy Policy explains what personal information we process, why we process it, the legal basis for processing and your rights in respect of your personal information.

This version of the Privacy Policy was last updated on 10th November 2021.

Privacy Policy

1. INTRODUCTION

We are a data controller of your personal information under applicable data protection laws and take your privacy seriously. We ask that you read this Privacy Policy very carefully because it contains important information about how we process your personal information and your rights.

If you would like this notice in another format (for example, audio, large print, braille) please contact us using the contact details provided below.

2. WHAT IS THE PURPOSE OF THIS PRIVACY POLICY?

This Privacy Policy sets out the basis on which any personal information we collect from you, or that is provided to us by a third party, will be processed by us.

3. HOW TO CONTACT US

If you have any questions about this Privacy Policy or personal information that we hold about you, including any requests to exercise your rights, please contact us using the details set out below:

Controller	Flybe Limited
Address	PO Box 929, Exeter, EX1 9AP
Email	customerdatarequest@flybe.com

In addition, you have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues (www.ico.org.uk).

4. CHANGES TO THIS PRIVACY POLICY

This version of the Privacy Policy was last updated on 10th November 2021.

This Privacy Policy may be updated from time to time. If the change materially impacts upon your rights and freedoms, we will inform you of changes made to this Privacy Policy by email. Otherwise, we will post an updated version of this policy to our website and include a link to the updated version in any emails that we send to you.

5. THE PERSONAL INFORMATION WE COLLECT OR RECEIVE ABOUT YOU

We collect or store personal information (and special categories of personal information) about you at different points in our relationship with you:

- if you visit our website or use an app provided by us;
- if you submit your personal information to us via our website or an app provided by us;
- in connection with a flight or service you have purchased from or through us; or
- if you call, email or write to us;
- if you enter a competition or provide feedback;
- if you subscribe to any of our publications; or
- if you contact us or submit information to us via social media platforms.

If you book or you are offered a flight with us, or purchase or are offered a service offered by us, through a third party (for example an online travel agent or holiday company), then that third party will send us personal information about you that we will use to provide the flight or service.

We may also have received your information as a result of the transfer of assets following the insolvency of the old Flybe Limited. If this is relevant to you, we will send you an email communication making it clear that we are now a data controller for your personal data as a result of the transfer of assets.

Privacy Policy

5.1 PERSONAL INFORMATION

We collect the following personal information:

Type of personal information	Personal information includes:
Advanced Passenger Information	<ul style="list-style-type: none">• full name• nationality• date of birth• gender (where required)• number and type of travel document (e.g. passport or ID), its expiry date and country of issue
Contact Data	<ul style="list-style-type: none">• billing address• delivery address• email address• telephone numbers
Financial Data	<ul style="list-style-type: none">• bank account• payment card details
Identity Data	<ul style="list-style-type: none">• first name• last name• username or similar identifier• title• date of birth• gender• passenger name record (or PNR)
Marketing and Communications Data	<ul style="list-style-type: none">• your preferences in receiving marketing from us and our third parties• your communication preferences
Profile Data	<ul style="list-style-type: none">• username and password• purchases or orders made by you• interests• preferences• feedback• survey responses
Technical Data	<ul style="list-style-type: none">• internet protocol (IP) address• login data• browser type and version• time zone setting and location• browser plug-in types and versions• operating system and platform• other technology on the devices you use to access our website or our app (for more information, please see our Cookie Policy which will be available when our new website launches). Until then, we won't deploy any non-essential cookies on your device when you access our website or our app.
Transaction Data	<ul style="list-style-type: none">• details about payments to and from you• details of flights and services you have purchased from us
Usage Data	<ul style="list-style-type: none">• information about how you use our website, app, flights and services (for more information, please see our Cookie Policy which can be accessed when our new website launches). Until then, we won't deploy any non-essential cookies on your device when you access our website or our app.

5.2 SPECIAL CATEGORIES OF PERSONAL INFORMATION

In addition to the above personal information, we also process the following types of special categories of personal information:

- health and disability information, which you provide to us when requesting any form of passenger assistance and records of illnesses or treatments received during a flight with us; and

Privacy Policy

- racial or ethnic origin (i.e. nationality), which you provide to us when completing your booking or providing the Advanced Passenger Information.

5.3 PERSONAL INFORMATION OF YOUR PARTY

If you are travelling as a party, you will need to provide the above personal information (and in some cases special categories of personal information) in relation to the party members and you must have their consent to provide us with such personal information.

6. HOW WE USE YOUR PERSONAL INFORMATION

We are required to tell you what we use your personal information for and the lawful basis on which we can process your personal information:

Purpose	Type of personal information	Lawful basis for processing	Details (including details of relevant legitimate interest)
To monitor browsing on our website or use of our app	<ul style="list-style-type: none"> • Technical Data 	<ul style="list-style-type: none"> • Legitimate interest • Consent 	<p>To improve the functionality and content of our website or our app, and to understand more about the types of products and services that you are interested in.</p> <p>For more information please see our Cookie Policy which can be accessed when our new website launches. Until then, we won't deploy any non-essential cookies on your device when you access our website or our app.</p>
To create an account with us	<ul style="list-style-type: none"> • Identity Data • Contact Data • Marketing and Communications Data 	<ul style="list-style-type: none"> • Legitimate interest 	<p>To collect information about our potential customers. We will not send you any electronic marketing in a personal capacity unless you have expressly consented to receive it.</p> <p>To improve the speed at which you can purchase flights and services from us.</p>
To process and complete your booking (boarding passes and coupons)	<ul style="list-style-type: none"> • Identity Data • Contact Data • Financial Data • Transaction Data • Marketing and Communications Data 	<ul style="list-style-type: none"> • Performance of our contract with you • Legitimate interest 	<p>To collect payments from you and deliver boarding passes and/or coupons to you.</p>
To process your request for any form of passenger assistance	<ul style="list-style-type: none"> • Special Category of Personal Information 	<ul style="list-style-type: none"> • Performance of our contract with you • Consent (including explicit consent where necessary) • Legitimate Interest • Your vital interest • Public interest 	<p>To enable us to meet your specific requirements for passenger assistance, both in departing and arriving airport.</p> <p>Ensuring the safety of our passengers.</p>

Privacy Policy

Purpose	Type of personal information	Lawful basis for processing	Details (including details of relevant legitimate interest)
To enable you to participate in a prize draw or competition	<ul style="list-style-type: none"> Identity Data Contact Data Profile Data Usage Data 	<ul style="list-style-type: none"> Performance of the prize draw or completion terms and conditions Legitimate interests Consent 	To promote our business through prize draws and competitions to you. We will not send you any electronic marketing to you in a personal capacity unless you have expressly consented to receive it.
To enable you to complete a survey	<ul style="list-style-type: none"> Identity Data Contact Data Profile Data Usage Data 	<ul style="list-style-type: none"> Legitimate interests 	To obtain feedback from you on our flights and services so that we can make improvements to them.
To manage and protect our business and our website or app (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> Identity Data Contact Data Technical Data 	<ul style="list-style-type: none"> Legitimate interests Necessary to comply with a legal obligation 	To manage our business and ensure the effective provision of administration and IT services, network security. To prevent fraud.
To process information about other passengers in your booking and the age range of any children traveling with you	<ul style="list-style-type: none"> Identity Data Contact Data 	<ul style="list-style-type: none"> Performance of a contract with you 	To process and complete the booking for you and each member of your party
To collect and process Advance Passenger Information	<ul style="list-style-type: none"> Identity Data Contact Data Special Category of Personal Information 	<ul style="list-style-type: none"> Legal obligation Performance of a contract with you 	To provide the authorities in the destinations that we fly to with the relevant passport and travel information.
To use data analytics to improve our website or app, flights and services, marketing (including advertisements), customer relationships and experiences	<ul style="list-style-type: none"> Technical Data Usage Data 	<ul style="list-style-type: none"> Legitimate interests 	To define types of customers for our flights and services. To keep our website or app updated and relevant. To develop our business and inform our marketing strategy.
To send personal marketing and promotional materials to you	<ul style="list-style-type: none"> Identity Data Contact Data 	<ul style="list-style-type: none"> Consent Legitimate interests 	To promote our flights and services to you.
To send marketing and promotional materials to you in a business context	<ul style="list-style-type: none"> Identity Data Contact Data 	<ul style="list-style-type: none"> Legitimate interests 	To promote our flights and services to businesses.

We may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your personal information. Please contact us if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table above.

Privacy Policy

Where we need to collect personal information by law or under the terms of a contract we have with you and you fail to provide that personal information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with flights or services or issue tickets). In this case, we may have to cancel your ticket or not provide the service to you, but we will notify you if this is the case at the time.

7. WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share your information with the following categories of third parties:

Third Party	Description
Our Service Providers	Our service providers include third parties that provide us services such as IT services, advertising and marketing services, facilities and security providers, payment processing, ground handling services, Baggage handling and repatriation, car parking and booking services, administration services and other business process services. Such third parties will act as our processors.
Our professional advisors	We may need to provide your personal information to our professional advisors that provide services to us. Our professional advisors include lawyers, accountants, bankers, auditors and insurers. Such third parties may act as our processors or independent controllers.
Authorities	<p>In addition to the Advanced Passenger Information, we may disclose personal information to customs and immigration authorities, border control agencies and law enforcement bodies when this is necessary to get you to your destination or is required by law. For example, for specific travel routes we are required to provide border control agencies with information that relates to your travel and itinerary.</p> <p>We may also disclose your personal information to the Civil Aviation Authority (CAA) or other aviation authorities, for the purposes of ensuring compliance with and the enforcement of the Air Travel Organisations Licence (ATOL) or similar regulations.</p>
Third Party Service Providers	We may offer third party products or services in connection with our products and services. This may include car rental, hotels, insurance and travel rewards. If you purchase any such third party products or services via us, then the relevant third party service provider will be an independent data controller in relation to your personal information. You can access the privacy policies of those third party service providers from them directly.
Third Party Loyalty Scheme Providers	We may share your personal information with third party loyalty scheme providers that you are a member of. We will do this in order to link the products and services that we provide to you with the products and services that such third party loyalty scheme providers may provide to you.
Other Airlines	From time to time, it may be necessary for us to contract with another airline operator to provide the flight for you. In this case, we will provide your personal information to such other airline operator solely for the purpose of providing the flight to you.

Privacy Policy

Code Share Airlines	If you booked a flight with us and the flight is provided by one or more airlines (for example, a code share airline) or another airline operator (in the circumstances described above), then those other airlines will be independent data controllers of your personal information and you should review their privacy information on their websites to understand how they will process your personal information.
Other Third Parties	<p>We may share your personal information with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets (including in relation to restructuring/insolvency situations). Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.</p> <p>Your personal information may be a transferred asset in any sale of all or part of our business.</p>

We require all our data processors and any other third party that we provide your personal information to respect the security of your personal information and to treat it in accordance with the law.

We do not allow our data processors to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

7. MARKETING

You may receive marketing communications from us if you have requested such communications from us or if you have purchased goods or services from us and you have not opted out of receiving future marketing communications.

We will get your consent before we share your personal information with any company outside of our group of companies for marketing purposes.

If you do not wish to receive marketing information from us you can opt-out by contacting us using the contact details at section 3 above or clicking the opt-out link in our electronic marketing communications.

8. PROFILING

We may use the personal information (including Technical Data) that we collect about you to create a profile about you in order to understand the products and services that are relevant to you. For example, we aim to suggest flights, services and offers that may interest you.

We will only send these suggested products and services to you by electronic means if you have explicitly consented to receive such information in our preference centre. Please contact us if you want to manage your preferences.

9. INTERNATIONAL TRANSFERS

Some of our Code Share Partners or other airline operators to whom we may be provided your personal information (in the circumstances described above) are based outside the United Kingdom (UK) and the European Economic Area (EEA).

Privacy Policy

Where this is the case, your personal information will be processed in accordance with the applicable carrier's privacy policy and, if your booking is made via a reservation system provider with its privacy policy. You should read such privacy policies, which will specify, for example, how your personal information is collected, stored, used, disclosed and transferred.

Whenever we transfer your personal information outside of the UK or the EEA, we ensure that the necessary protections (as required by the applicable data protection laws of the UK and/or the EEA (as applicable)) are in place prior to any such transfer.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information out of the UK or EEA.

10. DATA SECURITY

We use technical and organisational measures to safeguard your personal information, for example, we process all payment card transactions in accordance with the Payment Card Industry Data Security Standard and use secure connections on our website and our app to ensure that your payment card data is encrypted. In terms of the latter, this means that we convert your personal information into a computer code, which will make it harder for hackers to access your personal information on our website or our app.

While we will use all reasonable efforts to safeguard your personal information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal information that are transferred from you or to you via the internet. If you have any particular concerns about your personal information or if you notice anything suspicious, please contact us using the contact details at section 3 above.

11. DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal information are available from us on request using the contact details at section 3 above. We shall keep your personal information relating to Advanced Passenger Information for a period of 6 years from the date when you first provided us with a copy of such personal information or any longer period where required by applicable law.

12. YOUR LEGAL RIGHTS

You have rights, as a data subject, under applicable data protection laws in relation to your personal information. You have the right to:

- request access to your personal information
- request correction of your personal information
- request erasure of your personal information
- object to processing of your personal information
- request restriction of processing your personal information
- request transfer of your personal information
- withdraw your consent to any processing, where our processing is based on your consent

Privacy Policy

These rights are explained in more detail below. If you wish to exercise any of the rights set out above, please contact us using the contact details provided in section 3 above. We will respond to any rights that you want to exercise within a month of receiving your request, unless your request is complex, in which case it may take us longer and we will keep you informed of our progress.

It will help us to carry out our searches and respond to you promptly if you include with your rights request the email address that you think that we will have on file associated with your records. We may need to request further/specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Your right	Description
Request access to your personal information	This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
Request correction of the personal information that we hold about you	<p>You can require us to correct any mistakes in your information which we hold.</p> <p>If you would like to do this, please let us have enough information to identify you (e.g. account number, user name, registration details) and let us know the information that is incorrect and what it should be replaced with.</p>
Request erasure of your personal information	<p>This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.</p> <p>You can ask us to erase your personal information where:</p> <ul style="list-style-type: none">• you do not believe that we need your personal information in order to process it for the purposes set out in this Privacy Policy;• if you had given us consent to process your personal information, you withdraw that consent and we cannot otherwise legally process your personal information;• you object to our processing and we do not have any legitimate interests that mean we can continue to process your personal information; or• your personal information has been processed unlawfully or have not been erased when it should have been.
Object to processing of your personal information	<p>Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.</p> <p>You also have the right to object where we are processing your personal information for direct marketing purposes.</p> <p>In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.</p>
Request restriction of processing of your personal information.	<p>This enables you to ask us to suspend the processing of your personal information in the following scenarios:</p> <ul style="list-style-type: none">• if you want us to establish the personal information's accuracy;• where our use of the personal information is unlawful but you do not want us to erase it;• where you need us to hold the personal information even if we

Privacy Policy

	<p>no longer require it as you need it to establish, exercise or defend legal claims; or</p> <ul style="list-style-type: none">• you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use it.
Request the transfer of your personal information to you or to a third party.	<p>We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format.</p> <p>This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.</p>
Withdraw consent at any time where we are relying on consent to process your personal information.	<p>This will not affect the lawfulness of any processing carried out before you withdraw your consent.</p> <p>If you withdraw your consent, we may not be able to provide certain flights or services to you. We will advise you if this is the case at the time you withdraw your consent.</p>

Please be aware that there are exceptions and exemptions that apply to some of the rights, which we will apply in accordance with the applicable data protection laws.